



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



269436

September 4, 2002

REPLY TO THE ATTENTION OF

SR-6J

Mr. Douglas A. McWilliams, Esq.  
Squire, Sanders, & Dempsey, L.L.P  
4900 Key Tower  
127 Public Square  
Cleveland, OH 44114-1304

**Re: Chemical Recovery Systems, Inc. (CRS) Site Notice of Deficiency to the Quality Assurance Performance Plan (QAPP)**

Dear Mr. McWilliams:

This is to give you formal notice of the deficiency to the QAPP you submitted on August 27, 2002. The QAPP submitted does not comply with the guidance documents identified in the Administrative Order on Consent (AOC) Section VIII, Work To Be Performed, Paragraph 64.A.2. "U.S. EPA Guidance for Quality Assurance Project Plans (QA/G-5)" (U.S. EPA/600/R-98/018, February 1998), and "U.S. EPA 240/B-01/003, March 2001." You must revise your QAPP to comply with these guidance documents before it can be approved by U.S. EPA.

In your email dated August 28, 2002, you made reference to preparing the QAPP as prepared for the Bofors-Nobel Site in Michigan. Since the time the Bofors-Nobel Site QAPP was prepared, a newer requirement has been put into place for all new QAPP submittals. This requirement, as noted above, is identified in the AOC in Paragraph 64.A.2. The newer guidance requirement have a format change and require much more detail in several areas that was not captured in the older guidance. To compare the old and new guidance documents, visit the following website: <http://www.epa.gov/radiation/marssim/docs/revision1/appk.pdf>

Finally, also pursuant to the AOC Section VIII, Work To Be Performed, Paragraph 64.A.2, "Respondent will amend and submit to U.S. EPA a revised QAPP within thirty days of receiving U.S. EPA comments." You are hereby required to submit a revised QAPP prepared in accordance with the guidance documents identified in the AOC.

Please feel free to contact me if you have any questions or need additional information.

Sincerely,

Gwendolyn Massenburg, RPM

cc: Thomas Nash, ORC